

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MIGUEL MALDONADO,	)	
	)	08 C 1954
Plaintiff,	)	
	)	
vs.	)	Judge Aspen
	)	
CITY OF CHICAGO, et al.,	)	
	)	Magistrate Judge Nolan
Defendants.	)	

**AGREED INITIAL DISCOVERY PLAN**

Plaintiff Miguel Maldonado, by and through his attorney Leslie McCoy, and Defendant City of Chicago, by its attorney Mara S. Georges, Corporation Counsel for the City of Chicago, submit the following agreed, initial discovery plan:

**A. Present Status**

Plaintiff filed his complaint on April 4, 2008. The City filed its appearance on May 8, 2008 and its answer on June 9, 2008. The City has made numerous requests for documents and other information indicating any encounter between Plaintiff and members of the Chicago Police Department on January 24, 2008. Counsel for the City finally received information responsive to this request on July 29, 2008 and will produce this to Plaintiff forthwith.

**B. Proposed Discovery Plan**

Once the officers are identified, Plaintiff will file his amended complaint, and as soon as the named Defendants have answered the amended complaint, the parties will file an amended Discovery plan with the court.

Respectfully submitted,

MARA S. GEORGES  
Corporation Counsel of the City of Chicago

/s/ Leslie McCoy  
Leslie McCoy  
Counsel for Plaintiff Maldonado

By: /s/ Megan K. McGrath  
Megan K. McGrath  
Assistant Corporation Counsel